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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**UNIFOIL CORPORATION**

Plaintiff,

v.

**SOUTHEAST PERSONNEL LEASING,  
INC., LION INSURANCE COMPANY,  
NAVIGATORS INSURANCE COMPANY,  
INC., AND ZURICH AMERICAN  
INSURANCE COMPANY,**

Defendants.

Case No.: 2:18-cv-00018

Return date: February 5, 2018

**NOTICE OF MOTION  
SEEKING REMAND ORDER**

To: Counsel of Record

PLEASE TAKE NOTICE that on Monday, February 5, 2018 at 9:00 a.m. or as soon thereafter as counsel may be heard, plaintiff, Unifoil Corporation (“Unifoil”), by and through its undersigned counsel, Brown Moskowitz & Kallen, P.C. (Steven R. Rowland, appearing), shall move before the Honorable Madeline Cox Arleo, U.S.D.J. at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, New Jersey 07101, for entry of an Order, pursuant to 28 U.S.C. § 1447(c)

and Fed. R. Civ. P. 12(b)(1), remanding this matter to the Superior Court of New Jersey, Essex County.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Unifoil submits a Letter Brief in support thereof, the Certification of Steven R. Rowland, a proposed form of Order, and a Certification of Service.

PLEASE TAKE FURTHER NOTICE that Unifoil consents to the determination of this motion on the papers.

Respectfully submitted,

BROWN MOSKOWITZ & KALLEN, P.C.  
Attorneys for Plaintiff, Unifoil Corporation

By: /s/ Steven R. Rowland  
STEVEN R. ROWLAND

Dated: January 12, 2018